

Victoria Davis Lockard Tel 678.553.2103 Fax 678.553.2212 lockardv@gtlaw.com

January 8, 2025

VIA ECF

Special Master the Honorable Thomas Vanaskie Stevens & Lee 1500 Market Street, East Tower 18th Floor Philadelphia, PA 19103

> Re: <u>In re Valsartan, Losartan, and Irbesartan Products Liability</u> <u>Litigation</u>; Case No. 1:19-md-02875-RMB-SAK (D.N.J.)

Dear Special Master Vanaskie:

Defendants respectfully submit this letter request in connection with the upcoming Status Conference now scheduled for January 13th at 11:00 am via Teams (ECF No. 2952) and Special Master Order (ECF No. 2949) selecting the second wave of bellwether trials.

Plaintiffs' leadership has advised that Defendants must reach out to individual counsel of record in each of the selected bellwether cases in order to discuss case specific issues, such as dismissal requests. To facilitate these efforts and other necessary discussions, Defendants request that the Court issue an order requiring Plaintiffs' counsel of record in each of the twenty-eight bellwether cases to file updated Notices of Appearance with current contact information no later than January 15, 2025.

Additionally, Defendants request that Plaintiffs' counsel of record with representative authority in each of the bellwether cases currently selected for the second wave of bellwether trials (Roberts, Dufrene, Garcia, Smalls, Meeks, and Suits) be ordered to appear at the upcoming Status Conference via Zoom in anticipation of discussions with Your Honor regarding those cases.

We appreciate your consideration of this request, which will greatly help the parties facilitate identification and resolution of any hurdles in getting these cases prepared for trial.

Sincerely,

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Victoria Davis Lockard

cc: Counsel of Record (via ECF)